

**Before the Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
2014 Quadrennial Regulatory Review –)	MB Docket No. 14-50
Review of the Commission’s Broadcast)	
Ownership Rules and Other Rules Adopted)	
Pursuant to Section 202 of the)	
Telecommunications Act of 1996)	
)	
2010 Quadrennial Regulatory Review –)	MB Docket No. 09-182
Review of the Commission’s Broadcast)	
Ownership Rules and Other Rules Adopted)	
Pursuant to Section 202 of the)	
Telecommunications Act of 1996)	
)	
Promoting Diversification of Ownership)	MB Docket No. 07-294
In the Broadcasting Services)	
)	
Rules and Policies Concerning)	MB Docket No. 04-256
Attribution of Joint Sales Agreements)	
In Local Television Markets)	
)	
Expanding the Economic and Innovation)	GN Docket No. 12-268
Opportunities of Spectrum Through Incentive)	
Auctions)	

**COMMENTS OF
ASIAN AMERICANS ADVANCING JUSTICE | AAJC**

Jason T. Lagria¹
1140 Connecticut Ave NW
Suite 1200
Washington, DC 20036
202-296-2300 (phone)
jlagria@advancingjustice-aaajc.org

Asian Americans Advancing Justice | AAJC

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¹ Advancing Justice | AAJC summer clerk Ivy Yan, rising Senior at Harvard College, also contributed to these comments.

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I. Summary

Asian Americans Advancing Justice | AAJC (Advancing Justice | AAJC) submits the following comments in connection with the Federal Communications Commission's (Commission) Further Notice of Proposed Rulemaking and Report and Order regarding its broadcast ownership rules.² Advancing Justice | AAJC is dedicated to promoting a fair and equitable society for all by working for civil and human rights and empowering Asian Americans and other underserved communities. We provide the growing Asian American community with multilingual resources, culturally appropriate community education, and public policy and civil rights advocacy. In the communications field, Advancing Justice | AAJC works to promote universal access and reduce barriers to critical technology, services, and the media.

Despite the fact that one in four Asian Americans relies solely on over the air broadcasting³, only five full power television stations are Asian American-owned (0.4%).⁴ This is despite Asian Americans making up approximately six percent of the U.S. population, being the fastest growing racial group, and having a higher average household income than any other racial group. Moreover, we have observed that wireless speculators have purchased Asian-owned stations or stations carrying Asian-oriented content in anticipation of the upcoming spectrum incentive auctions. The loss of these outlets will have a direct negative impact on Asian American communities who rely on these stations.

² 2014 Quadrennial Regulatory Review – Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, MB Docket No. 14-50, Further Notice of Proposed Rulemaking and Report and Order, 29 FCC Rcd 4371 (2014) (hereinafter *2014 FNPRM*).

³ Nat'l Ass'n of Broadcasters, *Broadcast Television and Radio in Asian-American Communities* 1 (2013).

⁴ FCC, *Report on Ownership of Commercial Broadcast Stations*, DA 14-924 (rel. June 27, 2014) (hereinafter *2014 MB Report*). In total, racial and ethnic minorities own only 65 full power television stations (4.7%)

The Commission should pursue all options to secure race- and gender-conscious programs to promote broadcast diversity. Legal precedent makes clear that broadcast diversity is a compelling government interest, however, the Commission must rethink its overly burdensome standard it has set to satisfy strict scrutiny. The Commission should also consider remedying past discrimination as a compelling government interest.

Finally, the Commission should take simple steps to make its data more accessible, which will help analyze the effects of its policies on women and minorities.

II. Decreased Participation in Broadcast Media Harms Asian Americans and Pacific Islanders

Broadcast media remains a special and important source of information for communities of color, which make up 41% of broadcast-only homes.⁵ Broadcast is only available because of the government grant of licenses to use increasingly scarce public airwaves. Thus despite arguments that the Internet and other technologies have changed the way communities consume information, the Commission must ensure that the use of public resources is in the public interest, including promoting a diversity of voices, competition, and localism.

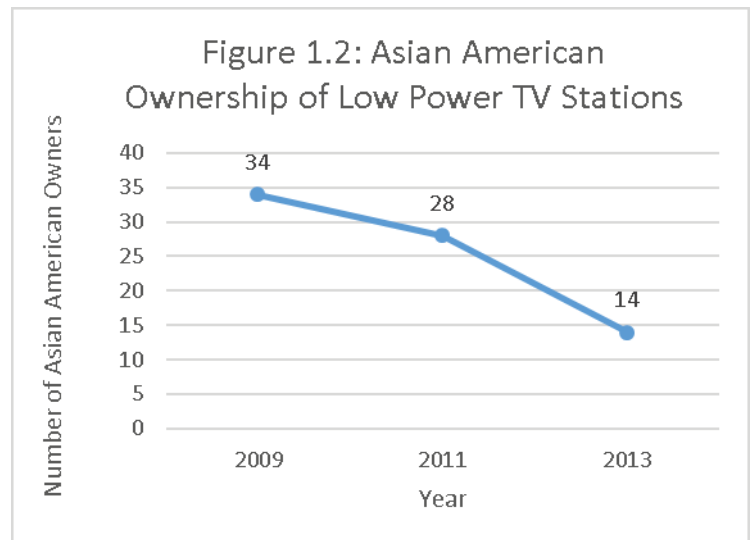
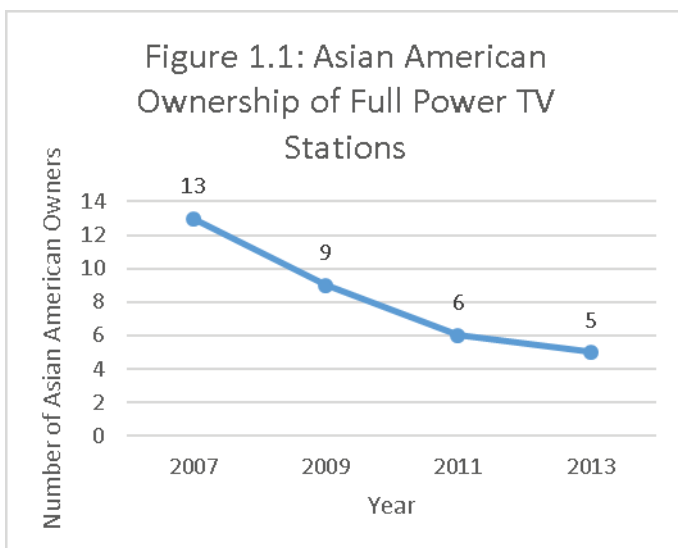
A. Broadcast Diversity Remains at Abysmal Levels

The Media Bureau's Report on the Ownership of Commercial Broadcast Stations reveals disturbing downward trends in television ownership diversity, particularly for Asian American and Pacific Islanders (AAPIs).⁶ Rather than improving or even staying constant at what was already a disproportionately low market share, the data show a marked decrease in AAPI

⁵ Press Release, Nat'l Ass'n of Broadcasters, Over-the-Air Renaissance Continues as Pay TV Cord-Cutting Rises (June 21, 2013).

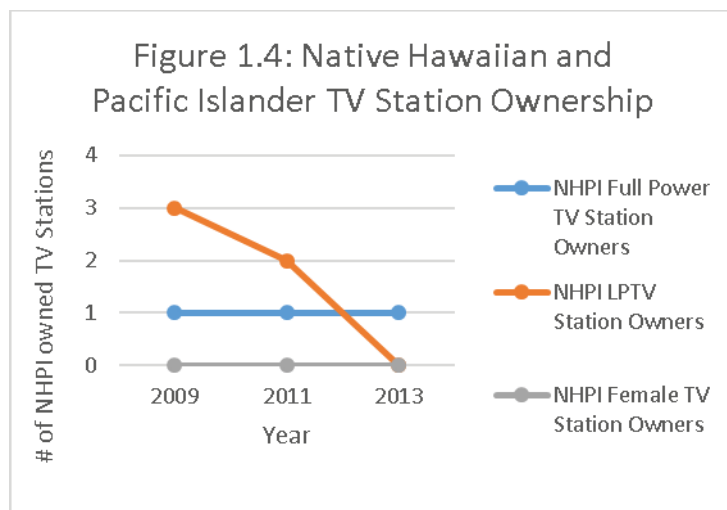
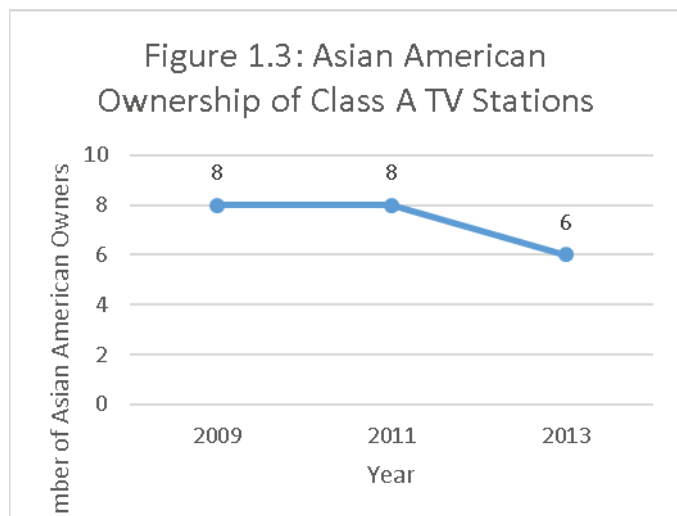
⁶ See 2014 MB Report.

ownership over the past four years.⁷ Between 2011 and 2013, the number of AAPI-owned full power television stations decreased from seven to six⁸, the number of AAPI-owned Class A television stations decreased from eight to six, and the number of AAPI-owned low-power television (LPTV) stations dropped by over 50% (from 30 to 14). African American- and American Indian/Alaska Native- owned television stations also experienced decreases in market share over the past two years. From these stagnant and often worsening ownership diversity numbers, the four years of 323 data collected since 2009 indicate with reasonable certainty that whatever race-neutral policies the FCC is implementing are not working (See Figures 1.1-1.4). This is not a surprise. Due to historical discrimination and lesser access to capital, minority entrepreneurs in the broadcast industry remain especially vulnerable to market variability and spectrum speculators compared to those who have traditionally dominated the market.



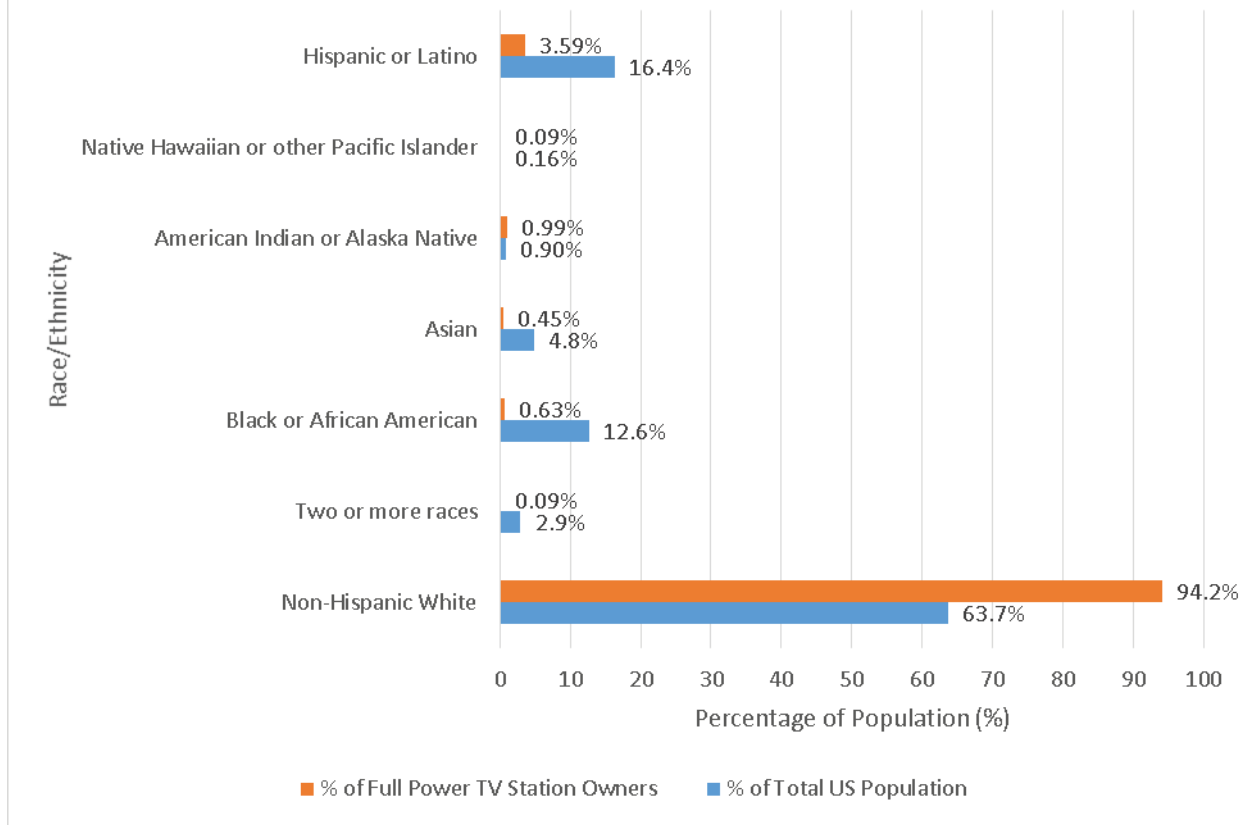
⁷ Underlying data for our analysis is provided in the Appendix.

⁸ 2014 MB Report at n. 16. Though the official number of Asian American owned full power television stations is listed as 19 on the FCC report, due to the bankruptcy of Young Broadcasting, Inc., where an Asian individual indirectly held a majority of the voting interests, control of the licensees of was transferred to Media General, Inc., a publicly-traded company with no Asian majority voting interest holder. The increase in the total Asian American owned stations from 2011 to 2013 resulted from a temporary ownership arrangement related to this series of transactions. When that arrangement was terminated in November 2013, the temporary increase in the number of racial minority-owned stations dropped back by 14. Thus, the true numbers of AAPI-owned full power television stations is six (five Asian Americans owned and one Native Hawaiian/Pacific Islander owned).



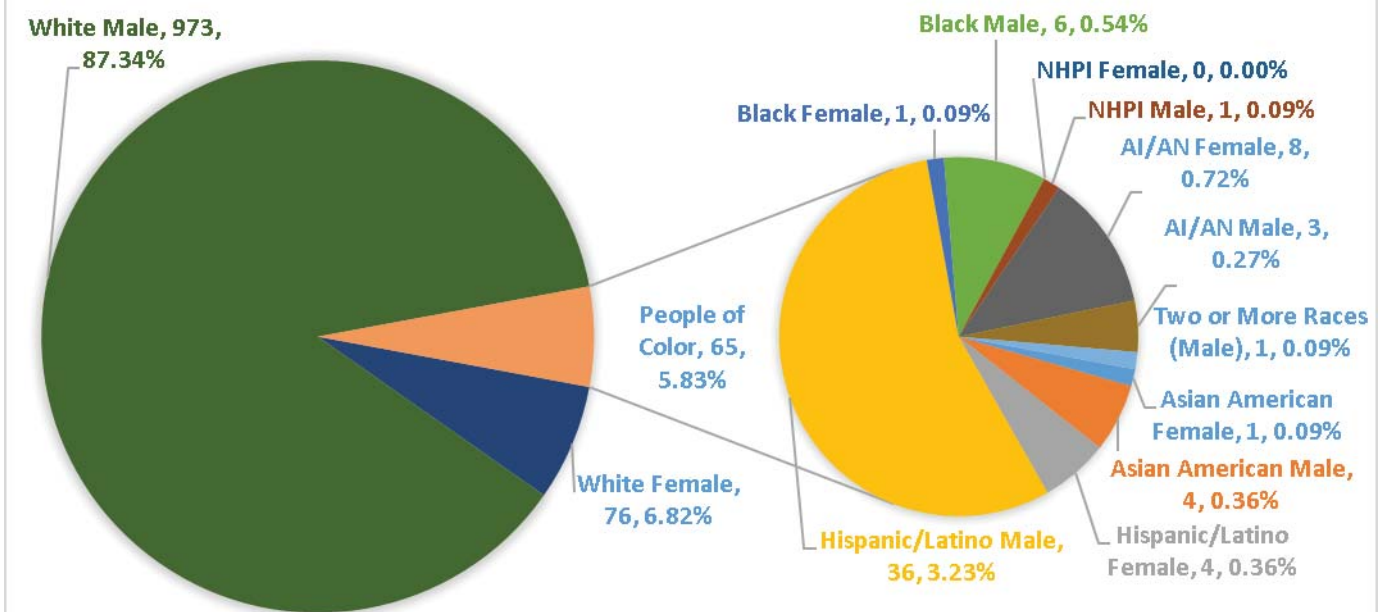
As shown in Figure 2.1, the demographic distribution of full power television station owners differs markedly from that of the general population. AAPIs, who comprise 4.96% of the general population only own 0.54% of full power television stations. In comparison, non-Hispanic whites own 94.2% of all full power television stations though they only comprise 63.7% of the general population.

Figure 2.1: Comparison of Full Power TV Owner and General U.S. Population Diversity



Breaking down the data further by gender, 87.3% of full power television stations are owned by non-Hispanic white males while 6.8% are owned by non-Hispanic white females (See Figure 3.1 below). Despite this conspicuous gender gap, white women still own more full-power stations than all racial and ethnic minority groups combined. Collectively, women of color own 14 full-power television stations (1.3%), and only one is owned by an Asian American woman.

Figure 2.2: Full Power TV Ownership Diversity - A Closer Look



This pattern holds almost entirely true with LPTV, though people of color have more of a foothold in this sector (See Figure 3.1). Non-Hispanic whites own 87.1% of LPTV stations, while Asian Americans own 1.2% (14 stations). As shown by Figure 1.2, however, this number is not a success, but a low point for our community, which held 34 stations just four years ago. Native Hawaiians and Pacific Islanders (NHPIs) lack any representation in the LPTV market, and hold only one full-power station in Hagatna, Guam (See Figure 1.4). Gender disparities again make themselves evident in the LPTV ownership numbers, though the number of Asian American female owned stations does outpace the number of Asian American male owned stations (See Figure 3.2).

Figure 3.1: Comparison of Low Power TV Owner and General U.S. Population Diversity

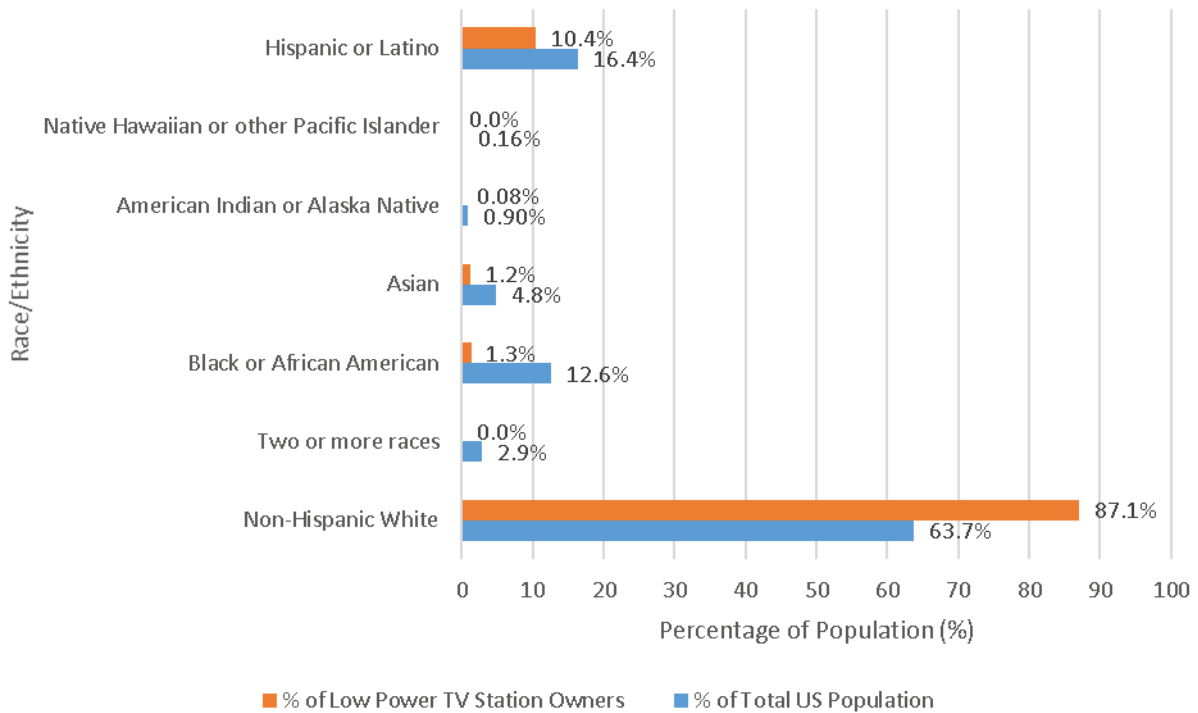
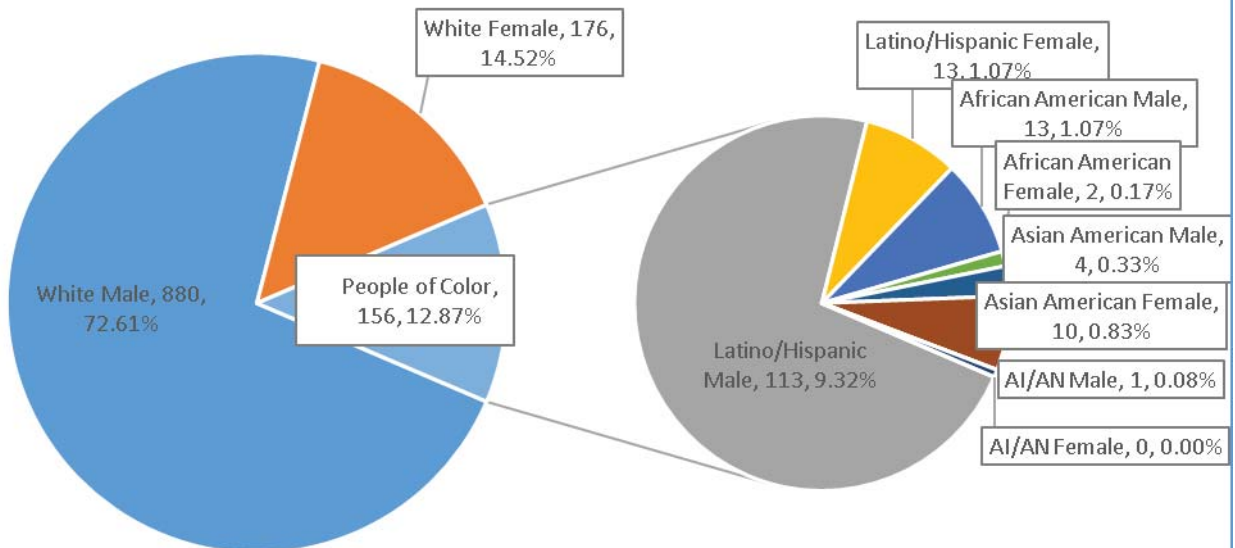


Figure 3.2: Low-Power TV Ownership Diversity: A Closer Look



The recent decreases in Asian American ownership can primarily be attributed to the financial difficulties of KM Communications, owned by Mrs. Myoung Hwa Bae.⁹ Over the past two years, many of KM Communication's stations have gone dark, while others have been purchased by speculators. It is a testament to how few Asian American television station owners there are that one struggling company can have such a significant effect on overall ownership numbers.

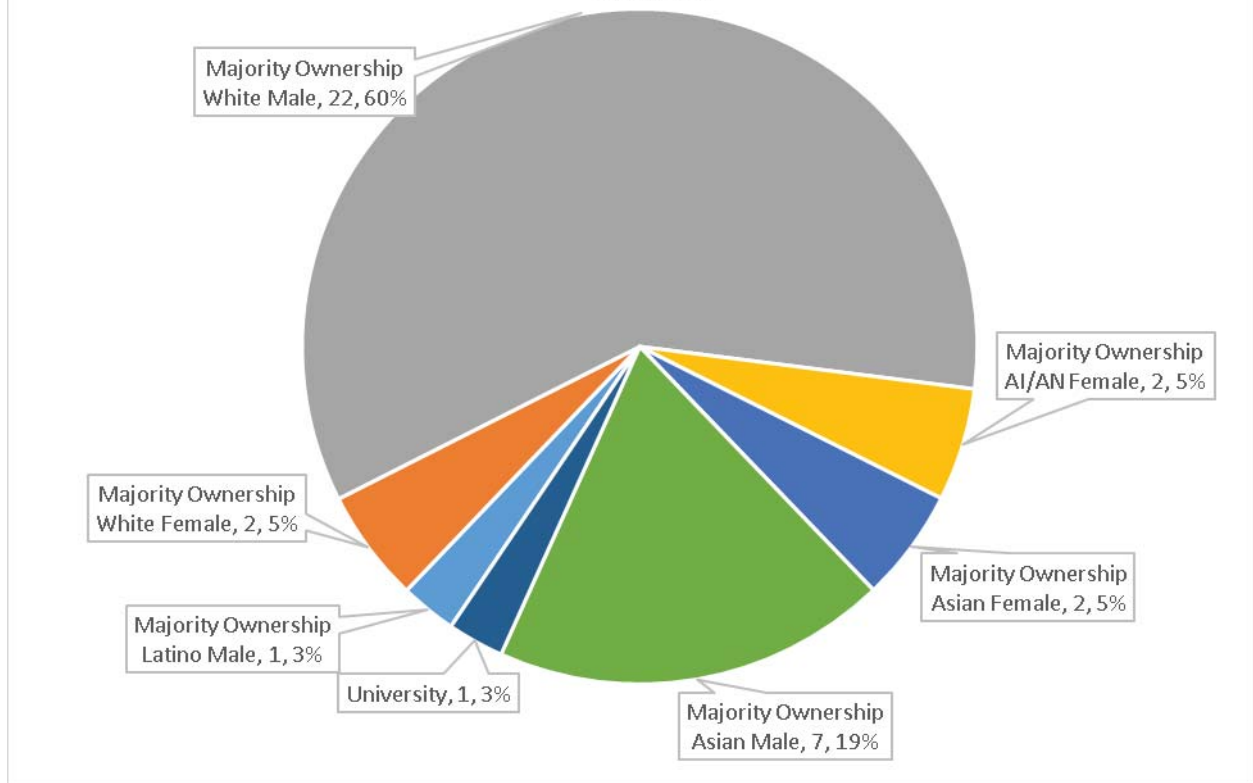
B. Wireless Speculators Have Decimated Stations Owned by Minorities and Those That Serve Minority Communities

Another emerging concern for communities of color has been moves made by speculators NRJ, OTA, and LocusPoint to buy out especially LPTV and Class A TV stations in anticipation of the upcoming incentive auction.¹⁰ So far, Advancing Justice | AAJC is aware of 37 television stations that have been purchased by these three companies over the past three years. These sales have disproportionately impacted the AAPI community, accounting for the loss of nine AAPI-owned stations since 2010 (See Figure 4.1). Though speculators have purchased more white-owned stations, the loss of nine stations for the AAPI community has a much greater impact. Beyond ownership diversity, AAPI viewers are poised to lose the most access to information due to speculator activity.

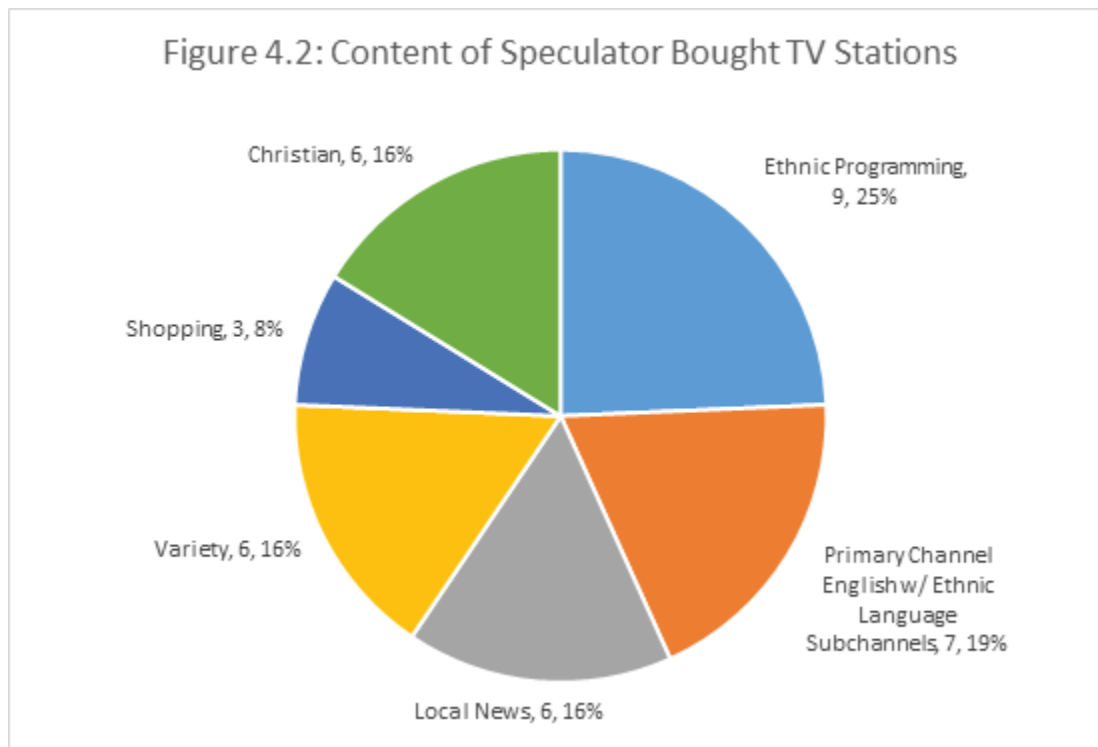
⁹ See FCC, 323 Ownership Report for Commercial Broadcast Stations, <http://data.fcc.gov/mediabureau/v01/tv/application/1588399.html> (June 2014).

¹⁰ See Current.org, Speculators Betting Big on FCC TV Spectrum Auctions, <http://www.current.org/2013/02/speculators-betting-big-on-fcc-tv-spectrum-auctions/> (Feb. 26, 2013); TVNewsCheck.org, Auction Talk Draws TV Spectrum Speculators, <http://www.tvnewscheck.com/article/49326/auction-talk-draws-tv-spectrum-speculators> (Feb. 23, 2011); Broadcasting & Cable, NHMC to FCC: Auction Likely to Decrease Diversity, <http://www.broadcastingcable.com/news/washington/nhmc-fcc-auction-likely-decrease-diversity/125125?rssid=20065> (Nov. 20, 2013).

Figure 4.1: Owner Demographics of Speculator Bought TV Stations



Moreover, nearly half the stations bought by speculators provide ethnic programming for AAPI communities (See Figure 4.2). The potential loss of these television stations' content is especially significant for Asian Americans because of eight of the nine TV Stations displaying ethnic language programming broadcast in at least one Asian language. Of the seven TV stations with an English language primary channel and ethnic language sub channels, six broadcast in an Asian language (the two TV stations with ethnic programming that do not broadcast in an Asian language provide Spanish language content). Most of the TV stations that provide ethnic language programming serve multiple language populations, which compounds the impact that the loss of even one of these stations could have.



For example, OTA purchased KAXT-CD, which broadcasts in the San Francisco/Bay Area region with a very high AAPI population, has digital subchannels that broadcast in Vietnamese, Punjabi, Tagalog, Chinese, Taiwanese, Spanish, and Hindi.¹¹

Another such station is KSKJ-CD, which was purchased by NRJ TV last year.¹² KSKJ is affiliated with CoLours TV, whose programming focuses on cultural and educational issues of the Hispanic, Black, Asian, and Native American communities.¹³

One of the most notable losses will be KSCI, an Asian-language station which was acquired by NRJ TV in 2012.¹⁴ According to Nielsen, KSCI is the most watched station among

¹¹ StationIndex.com, KAXT-CD Channel 1, <http://www.stationindex.com/tv/callsign/KAXT-CD> (2014).

¹² TVNewsCheck.com, Station Trading Roundup: 5 Deals, \$5.711M, <http://www.tvnewscheck.com/article/65270/station-trading-roundup-5-deals-5711m> (Feb. 5, 2013).

¹³ See Wikipedia, ColoursTV, https://en.wikipedia.org/wiki/Colours_TV (as of Aug. 6, 2014, 16:30 GMT).

¹⁴ TVNewsCheck.com, NRJ TV to Acquire Asian-Language KSCI, <http://www.tvnewscheck.com/article/58343/nrj-tv-to-acquire-asianlanguage-ksci> (Mar. 27, 2013).

Los Angeles Chinese and Korean Americans regardless of their language preference.¹⁵ In addition to local news broadcasts in Asian languages, the value of KSCI was displayed in October 2008 when it broadcasted the presidential debate with simultaneous Mandarin translation, improving access of LEP Chinese in the area to the democratic process.¹⁶

As shown by the 323 data collected since 2009, the Commissions policies have not promoted ownership diversity, and has in fact led to already low AAPI and other minority ownership numbers to decrease further.

C. Asian Americans are Harmed by Decreased Participation in Broadcast Media

Broadcast media remains a special and important source of information for communities of color, which make up 41% of broadcast-only homes. Though the duty of providing in-language and culturally specific content cannot fall entirely on minority owners, ensuring a diverse media landscape is especially important for Asian Americans to access information that is culturally and linguistically relevant—including lifesaving emergency information.

Approximately one-third of the Asian American community is limited English proficient (LEP).¹⁷ For example, Vietnamese, Bangladeshi, Cambodian, Hmong, Taiwanese, Chinese, Korean, and Laotian communities all have LEP rates over 40%.¹⁸ One in five Asian American households also live in linguistically isolated households, meaning all household members 14 years old and up speak English less than “very well.”¹⁹

¹⁵ Nielsen, Significant, Sophisticated and Savvy: The Asian American Consumer 2013 Report (2013).

¹⁶ Highbeam.com, Los Angeles TV Station to Broadcast October 7 Presidential Debate Live in Chinese, <http://www.highbeam.com/doc/1G1-187118059.html> (Oct. 16, 2008).

¹⁷ Asian Pacific American Legal Ctr. & Asian American Justice Ctr., *A Community of Contrasts: Asian Americans in the United States* 27 (2011).

¹⁸ *Id.* at 28. In 2007-2009 approximately 13% of Hmong, 7% of Cambodian, and 6% of Laotian American households accessed cash public assistance, compared to 5% of African American and 4% of Latino households.

¹⁹ *Id.* at 29.

Lack of sensitive media outlets also has a direct negative impact on AAPI communities. There is a particular need for broadcast diversity for Asian Americans because mainstream media outlets often do not cater to our community, nor do they accurately portray Asian Americans or depict positive Asian stereotypes. In fact, the highest rated mainstream television shows among Asian Americans are shows that have Asian American actors, which indicates a strong desire among Asian Americans to see stories of people who resemble them.²⁰ This is partly why Asian Americans are *avid* web surfers and online video viewers. Asian Americans spend twice as much time (over 12 hours) a month watching videos on the Internet as the general population.²¹

In an emergency situation, linguistically isolated households would not be able to take advantage of English-only emergency alerts. Advancing Justice | AAJC recently submitted comments to the Commission that highlighted how lack of broadcast media diversity leaves many LEP Asian Americans without emergency alert system (EAS) alerts in their native language despite executive orders requiring the government to do so.²² As an example, we previously provided to the Commission an analysis to show how the critical in-language needs of thousands of LEP Asian Americans in the Atlanta, GA region are not being met due in-part to lack of diversity over the airwaves.²³ According to the U.S. Census, the Asian American community in the Atlanta, GA region grew 88% from 2000 to 2010 and now makes up 5% of

²⁰ See Nielsen, *State of the Asian American Consumer: Growing Market, Growing Impact*, 11 (2012), <http://www.nielsen.com/content/dam/corporate/us/en/microsites/publicaffairs/StateoftheAsianAmericanConsumerReport.pdf>.

²¹ Nielsen, *Significant, Sophisticated, and Savvy: The Asian American Consumer 2013 Report*, 21 (2013), <http://www.nielsen.com/content/dam/corporate/us/en/reports-downloads/2013%20Reports/Asian-American-Consumer-Report-2013.pdf>. Of course, Internet is not a complete substitute for broadcast television and there remains a digital divide among minority, low income, and low educational attainment communities.

²² Letter from Advancing Justice | AAJC to Marlene Dortch, EB Docket 04-296 (July 3, 2014).

²³ *Id.* at 4.

Atlanta, whose population is 5,268,860.²⁴ The Atlanta Asian American community is composed of 20 Asian ethnic groups and the ten largest ethnic groups are listed below.²⁵

Ethnic Group	Number	LEP Rate for Population ≥ 5 years old	Approximate LEP Population
Indian	86,042	19%	16,348
Korean	48,788	47%	22,930
Chinese (except Taiwanese)	41,002	39%	15,991
Vietnamese	39,320	55%	21,626
Filipino	16,203	10%	1,620
Japanese	9,772	30%	2,932
Pakistani	9,685	21%	2,034
Laotian	5,106	39%	1,991
Cambodian	4,977	41%	2,041
Thai	3,377	Not available	--

Korean Americans are the only Asian group in the Atlanta region with broadcast stations that serve their community with in-language content. There is one class A TV station (WKTB-CD) and one AM radio station (WPBS) that broadcast in Korean. WKTB-CD has a multicast channel with a Korean-language local newscast at 9PM Monday to Friday but only airs EAS alerts in English, which it obtains from the primary entry point (PEP) station. WPBS is a Korean language Class D AM radio station and only operates during the day. Thus even for the Atlanta Korean American community, it may be without in-language emergency alerts if these stations are knocked out, weather patterns suddenly change or emergencies arise at odd hours when these stations are not operating, or the power goes out and limits internet and wireless communications.

²⁴ U.S. Census Bureau, 2010 Census SF1, Tables P5 and P6; U.S. Census Bureau, 2000 Census SF1, Tables P8 and P9.

²⁵ U.S. Census Bureau, 2010 Census SF1, PCT7 and PCT10 (ethnic groups); U.S. Census Bureau, 2006-2010 American Community Survey 5-Year estimates, Table B16004 (LEP rates).

III. The Commission Should Take Concrete Steps to Develop Race-Conscious Policies

The Commission has set forth a number of theories of how to justify race-conscious policies. We urge the Commission to explore all of its options and not prematurely rule out any for lack of evidence. The Commission should commission the necessary studies for it to properly decide which theories would most likely survive strict scrutiny.

A. Broadcast Diversity is a Compelling Government Interest

We agree with the Commission's analysis that its interest in promoting a diversity of viewpoints would be deemed sufficiently compelling to survive strict scrutiny analysis.²⁶ The Commission cites the D.C. Circuit's ruling in *Lutheran Church-Missouri Synod v. FCC*, 141 F. 3d 344, 354-56 (D.C. Cir. 1998), where it declined to hold that broadcast diversity does not rise to the level of a compelling government interest.²⁷ *Lutheran* is also distinguishable because the ruling dealt with employment diversity within a station rather than diversity of content between stations:

As a final point, we note the sort of diversity at stake in this case has even less force than the 'important' interest at stake in *Metro Broadcasting*. While the minority ownership preferences involved in *Metro Broadcasting* rested on an *inter-station* diversity rationale, the EEO rules seek *intrastation* diversity. It is at least understandable why the Commission would seek station to station differences, but its purported goal of making a single station all things to all people makes no sense. It clashes with the reality of the radio market, where each station targets a particular segment: one pop, one country, one news radio, and so on.²⁸

B. Conclusions on Narrowly Tailored are Premature

The Commission relies on dissenting opinions to set an artificial and unofficial standard that the nexus between diversity of viewpoint and minority ownership must be "nearly complete"

²⁶ 2014 FNPRM at ¶¶ 284-288.

²⁷ *Id.* at ¶287.

²⁸ *Lutheran*, 141 F. 3d at 355-56 (emphasis in original).

and “tightly bound.”²⁹ A narrowly tailored inquiry “must be calibrated to fit the distinct issues raised by the use of race”³⁰ *Fisher v. University of Texas* does not change this analysis.³¹ And the Commission is incorrect to conclude that *Fisher* requires the Commission to have “evidence of a stronger nexus between broadcast diversity and minority ownership than was shown in *Metro Broadcasting*[.]”³²

In *Grutter*, the Court explained narrowly tailored analysis in the context of student body diversity, which has many parallels to broadcast diversity. Its analysis included the examination of (1) the use of race as one of many factors, (2) race-neutral alternatives, (3) the harm on individuals who are not members of the favored racial and ethnic groups, and (4) sunset provisions.³³ Although the connection between station ownership and content is important, it is not dispositive under current law. The Commission’s analysis is therefore incorrect and premature without at least knowing how it will actually implement race-conscious policies.

C. The Commission Should Consider Remedying Past Discrimination as a Compelling Government Interest

While we agree viewpoint diversity is a compelling government interest, Advancing Justice | AAJC recommends the Commission also consider and conduct the necessary statistical disparity studies to establish past discrimination in the allocation of licenses as a compelling government interest.³⁴ Such a compelling government interest would alleviate the (unnecessarily high) burden the Commission has created in its narrowly tailored analysis.

The Supreme Court has clearly indicated there is evidence of past discrimination in the allocation of licenses and this evidence cannot go stale. In *Metro Broadcasting* the Court noted “Congress found that ‘the effects of past inequities stemming from racial and ethnic discrimination have resulted in a severe underrepresentation of minorities in the media of mass

²⁹ 2014 NPRM at ¶ 290; Id. at ¶ 298 n. 905 (citing dissenting opinions of J. O’Connor and J. Stevens).

³⁰ *Grutter v. Bollinger*, 539 U.S. 306, 334 (2003).

³¹ 133 S.Ct. 2411 (2013).

³² 2014 NPRM at ¶ 290 (citing *Fisher*).

³³ 539 U.S. at 338-44

³⁴ See 2014 FNPRM at ¶¶ 302-306.

communications.”³⁵ Justice O’Connor’s dissent in *Metro Broadcasting*, which the Commission cites to cast doubt on whether a race-conscious SDB standard would be narrowly tailored to promote diversity³⁶, clearly suggests the Commission has the evidence and power to establish race-conscious means to remedy past discrimination:

Our history reveals that the most blatant forms of discrimination have been visited upon some members of the racial and ethnic groups identified in the challenged programs. Many have lacked the opportunity to share in the Nation's wealth and to participate in its commercial enterprises. It is undisputed that minority participation in the broadcasting industry falls markedly below the demographic representation of those groups, *see, e.g.*, Congressional Research Service, *Minority Broadcast Station Ownership and Broadcast Programming: Is There a Nexus?* 42 (June 29, 1988) (minority owners possess an interest in 13.3 percent of stations and a controlling interest in 3.5 percent of stations), and this shortfall may be traced in part to the discrimination and the patterns of exclusion that have widely affected our society. As a Nation we aspire to create a society untouched by that history of exclusion, and to ensure that equality defines all citizens' daily experience and opportunities as well as the protection afforded to them under law.

For these reasons, and despite the harms that may attend the Government's use of racial classifications, we have repeatedly recognized that the Government possesses a compelling interest in remedying the effects of identified race discrimination. . . . *The FCC or Congress may yet conclude after suitable examination that narrowly tailored race-conscious measures are required to remedy discrimination that may be identified in the allocation of broadcasting licenses. Such measures are clearly within the Government's power.*³⁷

IV. The Commission Should Make its Data More Accessible

The Media Bureau’s Reports on the Ownership of Commercial Broadcast Stations do not provide any detailed information about minority owners (e.g. call signs, broadcast location, market rank, format, and content). They simply report aggregate ownership interests by race, ethnicity, and gender. Our analysis of the Commission’s data required cross-referencing multiple databases and substantial outside research. The significant time and resources spent on this

³⁵ 497 U.S. at 566 (citing H.R. Conf. Rep. No. 97-765, p. 43 (1982)).

³⁶ 2014 *FNPRM* at ¶ 290.

³⁷ 497 U.S. at 610-11 (emphasis added).

analysis has resulted in data that provides a clear understanding of the negative impact of the Commission's policies on minority communities. As the agency tasked with ensuring diversity within telecommunications, it should be the primary responsibility of the Commission, not overstretched nonprofits with limited resources, to provide accessible data for the Commission and other outside groups to conduct research on the state of women and minority broadcast ownership. Given how few minority owners there are, we do not foresee providing charts similar to those in the Appendix for racial and ethnic minorities being too significant of a burden for the Commission.

The Commission should also be more proactive in conducting research on the effects of its policies in media markets, especially with regard to activities that would undermine its mission, such as spectrum speculation of TV stations over the past three years. While Advancing Justice | AAJC has been able to cobble together some information on the three main speculators and the stations they have purchased, the FCC is much better positioned to monitor these developments as sales occur and to provide up-to-date information on what sort of stations are being targeted.

As for the FCC's public database³⁸, low power television stations' profiles and public inspection files were not available, which required us to query older FCC databases. Given how reliant the Asian American community and other minority communities are on LPTV, rectifying this gap in information would improve access to data for civil rights organizations and interested citizens.

³⁸ <https://stations.fcc.gov/>

V. Conclusion

A diverse and vibrant media ecosystem must include broadcast media given the growing reliance on it by communities of color. Unfortunately, minorities and women are not participating in this industry, which leads to specific harms for our communities. We urge the Commission to take concrete steps to implement a race- and gender-conscious program that put the Commission on track to encourage entrepreneurial spirit among historically underrepresented groups as well as to ensure that their communities' critical information needs are met.

Respectfully submitted,

Jason T. Lagria
1140 Connecticut Ave NW
Suite 1200
Washington, DC 20036
202-296-2300 (phone)
jlagria@advancingjustice-aajc.org

Asian Americans Advancing Justice | AAJC

August 7, 2014

APPENDIX

TV Stations Purchased by Spectrum Speculators

Call Sign	FCC ID	Year of Sale	Broadcast Location	Type	Minority Interest/Owner?	Gender Interest/Owner?	Previous Owner	New Owner	Content
KAXT	37689	2013	San Francisco	Class A	Herbert Alvarado 1% (Hispanic), Nalini Kapur 12% (Asian), Ravi Kapur 19% (Asian), Rishi Kapur 11% (Asian), Jeremy Noonan 13% (white), Robyn Noonan 13% (white), Sam Sutton 3% (white), Linda K. Trumbly 14% (white), Warren L. Trumbly 13% (white), Alicia Torres 1% (Hispanic)		KAXT LLC	OTA	Ethnic; South Asian, Vietnamese, Chinese/Taiwanese, Spanish, Tagalog, Punjabi, Shopping, Christian Programming; SSA with KTNC
KCNS	71586	2010	San Francisco	Full	Arthur Liu (majority)		Multicultural Television	NRJ TV	Ethnic; Spanish Fox, Chinese, Japanese programming
KFFV	49264	2011	Seattle	Full	Charlene Fay Casey (for her husband, who was Native American/AN) 51% + 9% as herself (she is white); Allen E. Hom 40% (Asian male)		North Pacific International Television, Inc.	OTA	Primary English; 44.1 OnTV4Us (Infomercials) 44.2 Azteca América (Spanish language) 44.3 AAT Television (Chinese language) 44.4 Untamed Sports (Niche outdoor and lifestyle programming) 44.5 WeatherNation
KFTL	52887	2012	San Francisco	Class A	NA		Polar Broadcasting, Inc./Family Stations, Inc.	Locus Point Networks	Ethnic; 28.1 Creation TV (Chinese) 28.2 Home Shopping Network 28.3 ZUUS Latino (Spanish music videos) 28.4 Vietstar (Vietnamese) 28.10 SAB TV (Indian comedy channel) 28.15 ZUUS Country

TV Stations Purchased by Spectrum Speculators

Call Sign	FCC ID	Year of Sale	Broadcast Location	Type	Minority Interest/Owner?	Gender Interest/Owner?	Previous Owner	New Owner	Content
KIKU	34527	2012	Honolulu, HI	Full	President, Myoung Hwa Bae and her husband, Kun Chae Bae. Their son, Kevin Joel Bae, is the General Manager of the company		KM Communications	NRJ	Ethnic; Most of KIKU's programming consists of multicultural content catering to the large Asian community in the Hawaiian Islands. Programs seen on the station are broadcast in Japanese, Tagalog, and English. Japanese programming is its most popular genre on the station, with content licensed from some of Japan's major television networks, including TV Asahi, Tokyo Broadcasting System, NHK and NTV. In 2011, KIKU expanded its Asian focus to include Chinese programming on Saturdays. KIKU partners with various companies to provide English subtitles for its Japanese programming to reach English-speaking viewers, some programs are subtitled in-house.
KMIR-TV	16749	2014	Palm Springs, CA	Full	Andre J. Fernandez 2% (Hispanic/Latino); Royce A Mills 0% (Black);	Mary Hill Leahy 1% (white); Elizabeth F. Brenner 2% (white); Ellen Siminoff 1% (white)	Journal Broadcast Corporation	OTA	Local News; main KMIR programming/NBC (KMIR newscasts focus heavily on the station's news brand "You Ask. We Investigate"; stories submitted by viewers. In May 2013, the station launched the franchise "The Eyesore Next Door" focusing on viewer reports of eyesore properties across the Coachella Valley.) 36.2/46.2 480i 4:3 Live Well Network (SD)
KNET-CD	3167	2013	Los Angeles	Class A	NA	NA	Venture Technologies Group	NRJ	Shopping; HSN

TV Stations Purchased by Spectrum Speculators

Call Sign	FCC ID	Year of Sale	Broadcast Location	Type	Minority Interest/Owner?	Gender Interest/Owner?	Previous Owner	New Owner	Content
KNLA	72270	2013	Los Angeles	LPTV/Class A	NA	NA	Venture Technologies Group	NRJ	Primary English; 20.1 HSN 20.2 CEN TV (Caribbean programming) 20.4 Aviva TV (Spanish religious)
KPSE-LP	51660	2014	Palm Springs, California	LPTV	Andre J. Fernandez 2% (Hispanic/Latino); Royce A Mills 0% (Black);	Mary Hill Leahy 1% (white); Elizabeth F. Brenner 2% (white); Ellen Siminoff 1% (white)	Journal Broadcast Corporation	OTA	Local News; Sister station KMIR produces three local news broadcasts for KPSE. This includes a two-hour extension of the NBC affiliate's weekday morning show. Known as KMIR News Today on KPSE My TV, the program can be seen from 7:00-9:00 a.m. offering a local alternative to Today. There is a nightly prime time newscast called KMIR News at 10:00 on KPSE My TV that runs for thirty minutes.
									Ethnic; 18.1 Independent programming in various languages 18.2 United Television Broadcasting/NHK World (Japanese) 18.3 MBC-D (Korean) 18.4 Christian Global Network TV (Korean religious) 18.5 USArmenia (Armenian) 18.6 Best TV (Armenian) 18.7 ARTN Armenian-Russian Television Network (Armenian) 18.8 LA 18.8 (Mandarin/Taiwanese) 18.9 Former: South Korean Digital TV mbn[22] (Korean)
KSCI/KUAN-LP	35608	2012	Long Beach, CA; LP to San Diego Market	Full	NA		AsianMedia Group, Inc.	NRJ	

TV Stations Purchased by Spectrum Speculators

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KSKJ-CD	36717	2013	Los Angeles	Class A	Robert Ruiz: Hispanic/Latino male w/ full ownership		Capital Broadcasting Group	NRJ	Ethnic; Was affiliated with Colours TV, which was a multicultural American TV network produced by the non-profit organization Black Star Communications. Programs focused on the cultural and educational issues of the Hispanic, Black, Asian, and Native American communities. It ceased operations on July 13, 2011.
KTLN-TV	49153	2011	San Francisco	Full	NA	NA	Christian Communications of Chicagoland, Inc.	OTA	Christian; Total Living Network (TLN) is a religious broadcasting channel based in Aurora, Illinois which carries a wide variety of family and ministry programs; Christian Communications has a two-year local market agreement with OTA to continue this programming; however, OTA has the right to terminate the LMA if they sell the station.
KTNC-TV	21533	2013	Sacramento and San Francisco	Full	NA	NA	Titan Broadcast Management LLC (has a 1/3 equity stake in NRJ); (Titan used to be called New World TV)	NRJ	Ethnic; 42.1 KTNC-SF Estrella TV // Bay Area 42.2 KTNC-SA Estrella TV // Central Valley 42.3 KTNC-Th This TV 42.4 KTNC-Br Retro Television Network

TV Stations Purchased by Spectrum Speculators

Call Sign	FCC ID	Year of Sale	Broadcast Location	Type	Minority Interest/Owner?	Gender Interest/Owner?	Previous Owner	New Owner	Content
KUBE-TV	70492	2013	Houston	Full	NA	NA	Titan Broadcast Management LLC (has a 1/3 equity stake in NRJ); (Titan used to be called New World TV)	NRJ	Primary English; 57.1 Independent (some syndicated programming, sports) 57.2 La Mera TV (Spanish infomercials) 57.3 BYN BYN (in Vietnamese) 57.4 KUBE-D4 Me-TV 57.5 KUBE-D5 Cozi TV
KUGB-CD	66790	2012	Houston	Class A	Thomas Abraham (Asian male 25%); Sarah T. Abraham (Asian female 25%); Bryan T. Abraham (Asian male 25%); Lauren Alexis Abraham (Asian female 25%)		Uniglobe Central American Network Inc. LLC	OTA	Christian; Under Uniglobe's ownership, the station broadcast programming from Central America, notably El Salvador, Honduras, Costa Rica and Guatemala. On January 4, 2011, Thomas Abraham took over Uniglobe and began broadcasting religious programming on multiple subchannels.
KVOS-TV	35862	2011	Seattle	Full	NA	NA	Newport Television Holdings LLC	OTA	Primary English; 12.1 Main KVOS-TV programming / Me-TV 12.2 Movies! 12.3 Sur Sagar TV (Canadian Punjabi language)
WARP-CD	55106	2012	Tampa	Class A	NA	NA	Sunshine Broadcasting Company	Locus Point Networks	Shopping; infomercials and some local programming over four subchannels

TV Stations Purchased by Spectrum Speculators

Call Sign	FCC ID	Year of Sale	Broadcast Location	Type	Minority Interest/Owner?	Gender Interest/Owner?	Previous Owner	New Owner	Content
WBGN-CD	247012	2013	Pittsburgh, PA; South-Western Pennsylvania, the Northern-Panhandle of West Virginia, and East-Central Ohio	LPTV	NA	Debra Goodworth (white female 37%)	Bruno-Goodworth Network, Inc	OTA	Local News; The station broadcasts a variety of programming including first run syndicated shows, second-run movies, children's shows, live religious broadcasts, and real estate shows. WBGN produces a number of regularly scheduled local programs, including Local News Breaks and local high school and professional sporting events. Since May 2006, the station also produces two-minute news and 30-second weather segments which air every half hour during prime-time hours.
WBNF-CD	30303	2014	<u>Buffalo, New York</u>	Full	Christina M. Coonce, Victoria M. Clark, Julie A. Nolan (Am. Indian/AN women 20% each)		Faith Broadcasting Network, Inc.	Locus Point Networks	Christian; 26.1 WNYB/TCT religious programming 26.2 TCT HD, a channel featuring an all-HD programming schedule different from TCT's main grid 26.3 TCT Family, a channel mainly featuring public domain sitcoms and films and Christian children's programming 26.4 La Fuente (Spanish religious programming)
WDVB-CD	168834	2013	Based in Edison, NJ, but mainly serves NYC	LPTV	Deepak Viswanath		Edison Broadcasting LLC	LocusPoint Networks	Primary English; 23.1 ZUUS Country 23.2 ZUUS Latino 23.3 Swagat TV (South Asian) 23.4 Sony SAB (South Asian)
WDW O-CD	68444	2013	Detroit, MI	Class A	Christina M. Coonce, Victoria M. Clark, Julie A. Nolan (Am. Indian/AN women 20% each)		TCT of Michigan, Inc.	LocusPoint Networks	Christian; Tri-State Christian Television (TCT) religious network

TV Stations Purchased by Spectrum Speculators

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WEBCD	67866	2012	New York	Class A	Young Dae Kwon (Asian male 77%)		K Media, Inc.	OTA	Christian; 17.1 UAN Main UAN programming (Christian programming) 17.3 GCN Global Christian Network
WGCB-TV	55350	2012	Philadelphia	Full	NA	Anna L. Plourde-Norris (white female 40% + 60% of her husband's estate)	Red Lion Broadcasting	NRJ	Variety; 49.1 Main WGCB-TV programming (family-oriented programming format with religious programs and off-network classic television) 49.2 Me-TV 49.3 The Works (Movies)
WSPY-TV	189058	2013	Plano, IL	Class A/LPTV	NA	NA	WSPY-TV Inc.	LocusPoint Networks	Variety; America One airs primarily international sports programming in prime time, reruns (including some public domain series) and syndicated programming during the day.
WLWC	3978	2013	Philadelphia	Full/ LPTV	NA	NA	Sinclair Broadcast Group	OTA	Variety; 28.1 WLWC-HDWLWC programming /CW 28.2 WLWC-SD Movies!
WMFP	41436	2010	Boston	Full/LPTV	Arthur Liu		Multicultural Television	NRJ	Primary English; 62.1 WMFP Main WMFP programming / Cozi TV (classic television series) 62.2 Cozi TV direct satellite feed 62.3 VIETV (Vietnamese programming) 62.4 THE WORKS 62.5 Retro

TV Stations Purchased by Spectrum Speculators

Call Sign	FCC ID	Year of Sale	Broadcast Location	Type	Minority Interest/Owner?	Gender Interest/Owner?	Previous Owner	New Owner	Content
WMGM-TV	61111	2014	Atlantic City, NJ	Full	Chesly Maddox-Dorsey (black female officer/director); Arthur Benjamin (black male officer); Julio Quintero (Hispanic male director)		Access.1 New Jersey License Company, LLC	LocusPoint Networks	Local News; NBC + local news; WMGM-TV currently broadcasts 21 hours of locally-produced newscasts each week (with four hours on weekdays and a half-hour each on Saturdays and Sundays); the station does not produce a midday newscast on weekdays or any morning or early evening newscasts on weekends. WMGM is the only remaining New Jersey-licensed commercial television station that maintains its own news department
WMJF-LP	67462	2012	Towson, MD	Class A/LPTV	90% student run		Towson University	LocusPoint Networks	Local News; University news, sports, entertainment programs
WOCH-CD	35101	2013	Chicago, IL	Class A	Myoung Hwa Bae (Asian female 100%)		KM Communications	NRJ TV Chicago License Co., LLC	Ethnic; With KM Communications, they aired programming from South Korea, and some locally-produced programs, non-Korean ethnic programming on weekends (such as programming from local cable television network Bostel); after April 2014, they began airing classic movie network The Works.
WPHA-CD	72278	2012	Philadelphia	LPTV/Class A	NA	NA	Randolph Weigner (D.T.V. LLC)	Sale to LocusPoint Networks, LLC pending	Shopping; Infomercials

TV Stations Purchased by Spectrum Speculators

Call Sign	FCC ID	Year of Sale	Broadcast Location	Type	Minority Interest/Owner?	Gender Interest/Owner?	Previous Owner	New Owner	Content
WPHY	74464	2012	Philadel-hia	Class A	NA	Diana Zaroni Potts (white female 15%); Doreen Damico (white female 15%)	WZBN TV, INC. owned by Zaroni family	NRJ	Local News; The station affiliates with America One, which provides a variety of programming during the days and weekends. It is the only independent television station to exclusively serve the residents of central New Jersey and has received several awards from the Community Broadcasters Association for local service and programming.
WRCF-CD	10549	2012	Orlando	Class A	NA	NA	Specialty Broadcasting Corporation	LocusPoint Networks	Variety; My Family Television
WSVT-CD	54948	2012	Tampa	LPTV/ Class A	NA	NA	Daystar Television Network, operated by Marcus D. Lamb's Word of God Fellowship	LocusPoint Networks	Christian; Evangelical Christian Television station
WTVE	55305	2011	Philadelphia	Full/ LPTV	NA	NA	WRNN-TV Associates	NRJ	Primary English; Main WTVE programming 51.2 THEWORKS The Works 51.3 VIETV Vietnamese television

TV Stations Purchased by Spectrum Speculators

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WUDT-LD	168267	2012	Detroit	LPTV	NA	NA	Daystar Television Network, operated by Marcus D. Lamb's Word of God Fellowship	LocusPoint Networks	Christian; Evangelical Christian Television station
WYCN-LP	9766	2013	Nashua, NH	Class A	NA	Deborah Born, Karen Cooper (white female 20% each)	Center Broadcasting Corp. of New Hampshire	OTA	Local Programming; The station carries local community programming, however most of its schedule is taken up by My Family TV programming
WZME	70493	2011	New York	Full	Arthur Liu	M	Multicultural Television	NRJ	Variety; 43.1 Main WZME programming / Me-TV 43.2 The Works; used to have Chinese language programming

2013 AAPI Owned LPTV Stations

FCC ID	Call Sign	New/ Veteran	Name of Owner	Name of Company	Location	Content
FEMALE ASIAN MAJORITY OWNERSHIP						
2960	WRAV-LP	Veteran	Julia Cuevo	AsiaVision, Inc.	Washington, D.C.	
74358	WYHB-LP	Veteran	Ying Hua Benns		Chattanooga, TN	
128364	WBKM-LP	Veteran	Myoung Hwa Bae	KM Communications	Chana, IL	
128366	WCRD-LP	Veteran	Myoung Hwa Bae	KM Communications	Carthage, IL	
129352	KWSJ-LP	Veteran	Myoung Hwa Bae	KM Communications	Snowflake, AZ	
129660	KWKM-LP	Veteran	Myoung Hwa Bae	KM Communications	Show Low, AZ	
131043	WMKB-LP	Veteran	Myoung Hwa Bae	KM Communications	Rochelle, IL	
131157	WRDH-LP	Veteran	Myoung Hwa Bae	KM Communications	Holcomb, IL	
131158	KTKB-LD	Veteran	KM Communication	Owned by KM Communications, but was operated by Marianas Media under a local marketing agreement	Hagåtña, Guam	CW
168063	WIAV-LD	Veteran	Julia Cuevo	AsiaVision, Inc.	Ocean City, MD	
MALE ASIAN MAJORITY OWNERSHIP						
2854	KSBT-LD	New	Billy Chung	R&C Media Group, Inc.	Santa Barbara, CA	
49882	W26DC	Veteran	Young Dae Kwon	K Media	Hempstead, NY	associated with WNYZ-LP in NYC
67859	W17CD	Veteran	Young Dae Kwon	K Media	Stamford, CT	associated with WNYZ-LP in NYC
128458	KTJH-LP	Veteran	Jeff Chang	Chang Broadcasting Hawaii, LLC	Ukiah, CA	

2013 AAPI Full Power TV Stations
(Highlighted stations still owned by AAPI)

FCC ID	Call Sign	New/ Veteran	Name of Owner	Company Name	Location	JSA/ SSA	Content
FEMALE ASIAN MAJORITY OWNERSHIP							
35096	KWKB	Veteran	Myoung Hwa Bae	KM Communications	Iowa City, IA	No	
MALE ASIAN MAJORITY OWNERSHIP							
6885	KWQC-TV		Held temporarily by Soohyung Kim and H.C. Charles Diao	Young Broadcasting*	Davenport, IA		*See Footnote 16 on the MB 2014 Report.
8378	KQSL	Veteran	Jeff Chang		Fort Bragg, CA	No	
35059	KLFY-TV		See KWQC-TV	Young Broadcasting*	Lafayette, LA		
41964	KPLO-TV		See KWQC-TV	Young Broadcasting*	Reliance, SD		
41969	KCLO-TV		See KWQC-TV	Young Broadcasting*	Rapid City, SD		
41975	KDLO-TV		See KWQC-TV	Young Broadcasting*	Florence, SD		
41983	KELO-TV		See KWQC-TV	Young Broadcasting*	Sioux Falls, SD		
43952	WMBC-TV	Veteran	Rev. Sun Young Joo (52%)	Mountain Broadcasting Corp	Newton, NJ	No	
63865	KILM	Veteran	Arthur Liu	KAZN-TV Licensee (Multicultural)	Barstow, CA	No	
65395	KBFD-DT	Veteran	June Ho Chung (52%)	Allen Broacasting Corporation	Honolulu, HI	No	One of two specializing in Asian programming full time (mostly Korean)
65526	KRON-TV		See KWQC-TV	Young Broadcasting*	San Francisco, CA		
71082	WATE-TV		See KWQC-TV	Young Broadcasting*	Knoxville, TN		
73188	WKRN-TV		See KWQC-TV	Young Broadcasting*	Nashville, TN		
74416	WRIC-TV		See KWQC-TV	Young Broadcasting*	Petersberg, VA		
74417	WBAY-TV		See KWQC-TV	Young Broadcasting*	Green Bay, WI		

2013 AAPI Full Power TV Stations
(Highlighted stations still owned by AAPI)

FCC ID	Call Sign	New/ Veteran	Name of Owner	Company Name	Location	JSA/ SSA	Content
74419	WCDC-TV		See KWQC-TV	Young Broadcasting*	Adams, MA		
74420	WLNS-TV		See KWQC-TV	Young Broadcasting*	Lansing, MI		
74422	WTEN		See KWQC-TV	Young Broadcasting*	Albany, NY		